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OPEN SPACE ASSESSMENT

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1.0 INTRODUCTION

- 1.1 This assessment has been prepared on behalf of Dukes Education and Radnor House School Limited, to support a planning and listed building consent application for (the Proposed Development):

“The demolition of existing modern buildings on the Site and the conversion of Kneller Hall and other ancillary buildings associated with the royal military music school to a day school (Use Class F1), together with the construction of associated new purpose-built buildings including teaching space, indoor sports facilities and sporting pavilion, and other ancillary works including landscaping, access and energy centre.

Internal and external alterations to Kneller Hall and the curtilage listed buildings to facilitate the day school use, including demolition and rebuilding of single storey extension to the west wing of Kneller, extension to the Band Practice Hall and re-opening of Whitton Dene Site entrance.”

- 1.2 The application Site is circa 9.7 hectares in size, within which, the eastern part of the Site is designated as Metropolitan Open Land (MOL), comprising circa 7.2 hectares, within the adopted Development Plan and London Plan. Part of the Proposed Development seeks to upgrade and enhance the existing outdoor sporting pitches and to provide a modern sports pavilion.
- 1.3 In accordance with the London Borough of Richmond’s (LBR or the Council) validation checklist and the requirements within Local Plan Policy LP 13 (Green Belt, Metropolitan Open Land and Local Green Space), this report has been prepared to assess the impact of the Proposed Development on the MOL.
- 1.4 This report should be read in conjunction with the submitted plans, Design and Access Statement and Landscape Design and Access Statement, all prepared by ADP, which illustrate the extent of the existing development within the MOL and the Proposed Development. In addition, it should be read in conjunction with the Visual Impact Assessment section of the submitted Heritage Statement, prepared by Icení (Section 5) and the Sports Provision Statement prepared by ADP.
- 1.5 A draft of this Open Space Assessment was submitted as part of the pre- application discussions. It has been updated to reflect the final proposed scheme and the pre- application feedback received from officers.

2.0 SITE DESCRIPTION

- 2.1 The Site was formerly a Royal Military School of Music, which included residential accommodation and was owned by the Ministry of Defence (MOD). They vacated the Site in Summer 2021. The freehold interest of the entire site, totalling 9.7 hectares, was acquired by Radnor House School Limited, which is part of the Dukes Education Group, from the MOD in September 2021.
- 2.2 The Site is accessed by road via Kneller Road, a 'Local distributor road' (Kneller Road/Warren Road) which provides access to Chertsey Road (A316), which links Richmond to Central London via Hammersmith and the M3 to the west.
- 2.3 7.2 ha of the 9.7 ha site is located within the Metropolitan Open Land (MOL). This designation covers the eastern part of the Site.
- 2.4 In addition to the aforementioned partial MOL allocation, the Site has its own LBRuT Local Plan (July 2018) policy, Policy SA 14 Kneller Hall, Whitton. The Site also has its own Supplementary Planning Document (SPD), titled the Kneller Hall Masterplan SPD (March 2020).
- 2.5 There are a significant number of on-Site trees protected through Tree Preservation Orders (TPO). The Site is also located in an Archaeological Priority Area.
- 2.6 The Northumberland River Site of Nature Conservation Importance (SINC) lies approximately 170m to the east. A small part of the south west corner of the Site is a proposed Tree Planting Area. There is an area of Other Open Land of Townscape Importance (OOLTI), essentially forming part of the green verge, opposite the Site on the south side of Kneller Road.
- 2.7 Kneller Hall is Grade II listed. Part of the boundary wall and four Gatepiers (at the main entrance and the end of the railed part of the boundary wall) are Grade II Listed. The Guardroom and Band Practice Hall are curtilage Listed Buildings.
- 2.8 There are no other statutory listed heritage assets within close proximity to the Site. The Site is not located within a Conservation Area. The closest Conservation Area is Rosecroft Gardens, which is located approximately 300m to the south and separated by the A316 and residential roads.
- 2.9 The Site is within Flood Zone 1, and therefore at low risk of fluvial flooding. The Site is in a location at risk of groundwater flooding and parts of the north and north west of the Site are at risk of surface water flooding.

Existing Built Development and Site Boundary

- 2.10 The existing buildings and structures are largely located in the western two thirds of the Site, set between Whitten Dene to the west, and Kneller Hall, which is the most prominent building (equivalent of 4 storeys). There are a range of other buildings within the Site which vary in scale (1-3 storeys). Some of the existing buildings are located within the part of the Site that is allocated as Metropolitan Open Land (MOL). The buildings are all set within a wider context of parking and circulation areas, green spaces and sports facilities.
- 2.11 Given the historic use of the Site by the MOD, the majority of the boundary treatments are secure, comprising a combination of brick walls, metal railings and palisade fencing. Views towards the MOL from the north and west are obscured by a dense treeline boundary and existing development. The boundary to the Site (including the listed wall) varies considerably in quality and style.
- 2.12 Within the part of the MOL related to this application, existing ad-hoc buildings, structures and hardstanding are present, situated to the north and east of Kneller Hall.
- 2.13 The buildings across the entire site were used by music school for a range of uses, ancillary to the main music school use. These include the Morris Hall (a sports hall), a sports pavilion, souvenir shop, sheds, garages, percussion hall, practice rooms, the Naffy (officer's mess/ social space), bedrooms/ sleeping accommodation. An Existing Site Plan is provided at **Appendix 1**.
- 2.14 The table below sets out the existing built development within the MOL:

Existing Building Footprints (sqm)	Existing Built Floorspace (GIA) (sqm)	Existing Volume (sqm)	Existing Hardstanding (Excluding Buildings) (sqm)
1,197	1,032	2,544	6,448 (includes tennis courts)

- 2.15 The remaining MOL within the application boundary predominately consists of grasslands, including land used as sporting pitches. During the MOD's occupation of the Site, the sporting pitches located in the MOL were used by the MOD. The pitches were not accessible for use by members of the public for sports use. This is discussed further in the next section. There is also an outside bandstand, which was used for outside concerts.

3.0 EXISTING PLAYING PITCHES

- 3.1 The land on the eastern part of the site is considered to fall into the definition of ‘playing pitches’ as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015. The 2015 Order definition is *“a delineated area which, together with any run-off area, is of 0.2 hectares or more, and which is used for association football, American football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, Australian football, Gaelic football, shinty, hurling, polo or cycle polo.”*
- 3.2 The playing pitches were used by the Royal Military School of Music until they vacated the site in Summer 2021 and the Site was sold by the MOD to the Applicant. The pitches were used for sport and recreation for the military personnel based at the site. There was not public access to the pitches or community use of the pitches for sport. Dukes Education has spoken with the MOD to confirm this, and they have advised that the only use of the pitch, outside of the Royal Military School/ MOD use, was by the Rugby Football Union (RFU) who hired the land on occasions to erect hospitality marquees during large events held at Twickenham Stadium, such as the World Cup and Six Nations etc. The land was also used for car parking and on occasions part of the stage set up, when bandstand concerts, hosted by the MOD, took place at the Site.
- 3.3 The layout and use of these pitches is understood to have changed over time, as illustrated by Google Earth satellite images of the site. **Appendix 2** of this document provides the Google Earth satellite images of the Site between 1999 and 2022. In some years, no line markings are visible from the Google Satellite images, but in other years, it is clear that there has been two grassed pitches marked out, one on the far southern part of the pitches and another to the north. The latter of which’s orientation has changed over time. The pitches location on the land appear to have varied over time, and varies between football and rugby markings. There is also an artificial grass cricket pitch visible in the centre of the pitches. In addition, the two tennis courts are clearly visible. There is also evidence of football posts placed irregularly, indicating informal recreation use of the pitches but the MOD at times.

3.4 Richmond’s Playing Pitch Strategy (2018) identifies the pitches on Page 64 as used for football as shown below:

**LONDON BOROUGH OF RICHMOND UPON THAMES
PLAYING PITCH STRATEGY**

Site ID	Site	Sport	Management	Current status	Recommended actions	Partners	Site hierarchy tier	Timescales ²³	Cost ²⁷	Aim
55	St Marys University	Rugby	University	Two senior rugby pitches, one of which is assessed as good quality and predominately used for matches, whereas the other is assessed as standard quality and predominately used for training. The training pitch is floodlit and overplayed, whilst the match pitch is without floodlighting and is played to capacity at peak time. Used by Harlequin Amateurs RFC as well as by university teams.	Sustain quality of match pitch through appropriate maintenance.	RFU University	Key centre	L	L	Protect Provide
					Consider providing an additional pitch as part of the University’s master planning in order to alleviate overplay.			M	M	
62	The Royal Military School of Music	Football	School	A standard quality adult pitch that is played to capacity.	Sustain pitch quality through appropriate maintenance.	FA School	Local	L	L	Protect
					Provide security of tenure for club users through community use agreements.			S	L	

3.5 In the March 2019 and September 2019 update to the Playing Pitch Strategy it identifies the following update “The Council are now working with the Defence Infrastructure Organisation (on behalf of the Ministry of Defence, as landowner) to develop a masterplan supplementary planning document for the site. It is thought that the site has been used for rugby and cricket, although the extent of this use is not known.”

3.6 In the March 2021 update to the Playing Pitch Strategy the following is detailed at page 20:

Site ID	Site	Sport	Management	Current status	Recommended actions	Actions taken (Jan 2021)	Issues raised (Jan 2021)	Partners	Site hierarchy tier	Timescales ⁷	Cost ⁸	Aim
62	The Royal Military School of Music	Football	School	A standard quality adult pitch that is played to capacity.	Sustain pitch quality through appropriate maintenance.		Kneller Hall Supplementary Planning Document was adopted 6 April 2020. This provides guidance for future development on the site. The MoD has now invited buyers to put forward bids to purchase the site.	FA School	Local	L	L	Protect
					Provide security of tenure for club users through community use agreements.					S	L	
		Tennis	School	Two tennis courts	Explore the possibility of community use of the site once the MoD have disposed of the site.		The current ownership and fencing has understandably limited community use of the site.	School	M	L	Protect	
		Rugby	School	One grass field					M	L	Protect	
		Cricket	School	One artificial cricket strip					M	L	Protect	

3.7 In the June 2021 update to the Playing Pitch Strategy, the following is added under the Royal Military School of Music row in the table: “This site could provide a solution to capacity issues elsewhere in the borough.”

3.8 The January 2022 update to the Playing Pitch Strategy confirms the following:

Site ID	Site	Sport	Management	Current status	Recommended actions	Actions taken (Jun 2021)	Actions taken (Jan 2022)	Issued raised (Jun 21/Jan 22)	Partners	Site hierarchy tier	Timescales ²	Cost ³	Aim
62	The Royal Military School of Music	Football	School	A standard quality adult pitch that is played to capacity.	Sustain pitch quality through appropriate maintenance.	Kneller Hall Supplementary Planning Document was adopted 6 April 2020. This provides guidance for future development on the site. The MoD has now invited buyers to put forward bids to purchase the site.	Kneller Hall has been sold to Dukes Trust which intends to use the site for a school.		FA School	Local	L	L	Protect
					Provide security of tenure for club users through community use agreements.								
		Tennis	School	Two tennis courts	Explore the possibility of community use of the site once the MoD have disposed of the site.	The current ownership and fencing has understandably limited community use of the site. This site could provide a solution to capacity issues elsewhere in the borough			School		M	L	Protect
		Rugby	School	One grass field							M	L	Protect
		Cricket	School	One artificial cricket strip							M	L	Protect

3.9 In the Playing Pitch Strategy Assessment Report (Updated March 2018) prepared for the Council by Knight, Kavanagh and Page Ltd, the report refers to there being 3 pitches, which are unsecured and are adult pitches. The current play is listed as '10' and site capacity is listed as '9' suggested the facility is overused. We do not know where this data comes from. The table also indicates that the site is available for community use, but no further details of this is provided. This does not align with the Applicant's understanding or what they have been told by the MOD, which is that the pitches were only used for sport and recreation by members of the Royal Military School, whilst they were based at the Site.

4.0 NEW SCHOOL AND UPGRADED OUTDOOR SPORTS REQUIREMENT

- 4.1 The Site will remain in educational use. However, as opposed to being used as a music school with residential accommodation, it will be a day school for boys and girls ages between 11 and 18 years (Year 7 through to sixth form).
- 4.2 Dukes Education have provided further information on how the school will operate and the demand for places in the submitted Education and Community Use Document prepared by Dukes Education. This report, the submitted Design and Access Statement and Sports Provision Statement explain why the Proposed Development and facilities are needed to meet Sport England and Department for Education requirements for a senior school.
- 4.3 The school and the facilities that will be provided will offer pupils a high standard of education with access to modern facilities and a wide curriculum comprising of academic subjects and also sports, drama and music.
- 4.4 The Military School occupier used some of the land within the MOL as sports pitches. These included grassed pitches, two hardstanding tennis courts and a hardstanding basketball court. These facilities were used by members of the Military that were based at or doing courses at the Royal Military School. There was also a sports pavilion and sports hall (Morris Hall) located in the MOL for use by officers. They were not accessible to the public. All these facilities are dated and poor quality. They would not meet current modern standards. The Proposed Development will retain these sports uses but upgrade the facilities.
- 4.5 Also located in the MOL, and used by the former occupier was an outside bandstand. This was used for outside concerts where members of the Royal Military School played. It is understood that on occasions members of the public were invited to attend these outside concerts.
- 4.6 The Proposed Development will not only provide excellent facilities for the school, it will also provide facilities that can be used by local schools and community groups. Whilst this access will be pre-arranged and managed access, there will be significantly greater access opportunities than when the Site was in use by the Royal Military School. Details of the community access are set out in the submitted Education and Community Use Document prepared by Dukes Education and in the Draft Community Use Agreement. It will include use by community groups and schools of the outside sports facilities and associated sports pavilion; the swimming pool; sports centre; invitations to school concerts at the Bandstand; and access to the outside learning Forest School programme.

Upgraded and New Sports Pitches

- 4.7 It is also important to consider the contribution the Proposed Development shall make towards the quality and quantity of outdoor recreation within the Borough. As touched on previously, there will be managed access to the facilities for members of the public, including local schools and community groups. When the MOD owned the Site, there was no public access to the sports pitches or tennis courts on the Site and therefore the proposal reflects an improvement, in terms of the public's enjoyment of the Site and its facilities.
- 4.8 A review of the London Borough of Richmond upon Thames Playing Pitch Assessment (March 2018) identifies:
- **Football:** The assessment concludes identifying nine sites are overplayed by a total of 26 match equivalent sessions per week, and there is a current shortfall of youth 11v11 match equivalent sessions, whereas spare capacity exists on the remaining pitch types, in addition to there being a future shortfall of adult, youth 11v11 and youth 9v9 match equivalent sessions, whilst spare capacity remains on mini 5v5 and mini 7v7 pitches.
 - **Tennis:** For Whitton Park tennis clubs, further exploration is required to determine if their needs are being met as current and future demand is unknown.
 - **Rugby:** When considering access to rugby pitches, there are 11 senior pitches across six sites that are overplayed by a total of 28 match equivalent sessions per week. The report concludes that there is a current shortfall of 25 match equivalent sessions to meet rugby union demand in the Borough and a future shortfall of 35.5 match equivalent sessions.
 - **Hockey:** There are four community hockey clubs in LBRuT, consisting of 28 men's teams, 21 women's teams and 44 junior teams. Three of the club express displaced demand. Combined, there is believed to be a collective waiting list of around 600 children across Barnes, Teddington and Richmond clubs. Richmond and Teddington hockey clubs express future demand for both senior and junior team. There is clear undersupply of hockey suitable AGPs within LBRuT and its surrounding areas.
 - **Artificial Pitches:** It is appropriate to ensure that sufficient sand based Artificial Grass Pitches are retained for the playing development of hockey. The borough has identified a clear undersupply of hockey suitable Artificial Grass Pitches within Borough and its surrounding areas, with teams having to travel further to access a suitable pitch.

4.9 The Council's Planning Pitch Strategy Action Plan Update (January 2022) confirms that the Council should *"Explore the possibility of community use of the site once the MoD have disposed of the site."*

4.10 Two rounds of consultation has taken place with Sports England. Their full feedback is provided in the submitted Sports Provision Statement. Sports England's feedback confirms the demand for additional sports facilities provision in the borough:

- The Football Foundation state that there is a strategic need for additional football pitches within the Borough. Affiliated football within Richmond grew from 245 teams in 2020/21 to 264 in 2021/22 with the main increase in youth football. At present 26 of these teams train and play outside of the Borough.
- The RFU have stated that it would support access to the playing and ancillary facilities via a Community Use Agreement. It is anticipated that the contribution this would make to the facility stock in Richmond would be limited due to the lack of sports lighting, but may be useful for daytime match play provision.
- Badminton England stated that Kneller Hall School is in an area where there is significant demand for badminton – it's near to The Middlesex Dome (where numerous clubs play) and clubs in this area are always looking for new facilities to expand into.
- The LTA stated that the 2 courts on this land were previously used solely by the Royal Military School, there was no community use, however the proposals are to light and improve the 2 tennis courts and allow managed access outside of school hours, which aligns with the LTA's strategy of Tennis Opened Up. LTA know the penetration generally across Richmond and Hounslow is high so having a new accessible lit facility would be great to cater for local demand.
- The England and Wales Cricket Board (ECB) highlights that demand has moved on significantly since Richmond's assessment on 2015 of provision. Furthermore, although the total stock of cricket pitches is higher than in some nearby boroughs, as well as the local latent demand, there is also imported demand from the London Borough of Hounslow especially (which has a chronic deficit of fine turf pitches). The only new grass square being built since 2014 is the one at Christ's School in Richmond/North Sheen and there is a chronic lack of other potential sites in the borough where new cricket squares and facilities could be constructed.

- ECB welcome the ECB welcome the inclusion of a fine turf square and associated clubhouse facility. This will need to be compliant with ECB Technical Specification 5 (TS5: Pavilions & Clubhouses).
- Middlesex Cricket recently put together fully comprehensive teams data for the 2022 season. This demonstrates how demand for competitive cricket in the borough has moved on since the PPS's 2014 data, showing net growth, concerning women's and girls' cricket especially.

4.11 As such, when considering any harm to the openness of the MOL, it should be balanced against the scheme as a whole and the benefits that it will bring. The new and upgraded outdoor sporting facilities shall contribute towards enhanced provision on the Site in accordance with the Playing Pitch Strategy; demand and need identified through the Sports England pre- application feedback; and the aspirations of Local Plan Policy LP 31 (Public Open Space, Play Space, Sport and Recreation).

5.0 PROPOSED DEVELOPMENT

- 5.1 This section should be provided in conjunction with the plans provided at **Appendix 3**, which provide details on the existing and proposed built development in the MOL, in terms of floor area, volume and hardstanding. This information is also provided in the submitted Design and Access Statement.
- 5.2 During the early stages of the design process, the MOL was a key consideration when considering layout of the scheme. Whilst in the initial masterplan prepared by the previous project architect suggested that the Sports Hall was positioned in the MOL, the masterplan was quickly revised in order to minimise the extent of built development in the MOL and to preserve the openness.
- 5.3 The majority of the proposed new development is to be located outside of the MOL, on existing brownfield land, on the west and central part of the Site.
- 5.4 The masterplan has also sought to remove, where possible, any existing structures and buildings from the MOL that are not required and are low quality. This has resulted in the proposed removal of the following buildings from the MOL: the Morris Hall and Sports Pavilion which will be replaced with a high quality and modern sports pavilion; the Souvenir Shop, Shed, Percussion Hall, Practice Rooms, Professors Lounge, Disabled Toilet and some of the Garages, although others will be retained and re-purposed to use as the Energy Centre and for grounds maintenance storage. The Existing Site Plan at **Appendix 1** illustrates the locations of these existing buildings.
- 5.5 The table below illustrates the reduction in footprint, floorspace, volume and hardstanding in the MOL, as a result of the Proposed Development:

	Building Footprints (sqm)	Built Floorspace (GIA) (sqm)	Volume of Built Floorspace (sqm)	Hardstanding (Excluding Buildings) (sqm)
Existing Total	1,197	1,032	2,544	6,448 (including tennis courts)

Proposed Total (including floorspace to be retained and converted)	538	484	1,453	5,808 (including tennis courts)
Net Decrease	659	548	1,091	640

5.6 Set out below is the Proposed Development to be retained and new build development within the MOL.

5.7 Existing development within the MOL to be retained:

- Bandstand and hardstanding pathway leading to the bandstand. Following pre-application discussions with the Council and engagement with local residents and Councillors, it was considered important to retain the Bandstand, which is situated within the MOL. Whilst it has no statutory and/or non-statutory listing or protections, it is an important structure which pays homage to the Site’s historical musical legacy and provide an opportunity for music-based events and concerts to continue to be held at the Site, including events that the public can be invited to.
- Hardstanding area with existing lighting, currently in use as car parking to the north east of Kneller Hall which will be retained and used for coach and community use parking and as a hard landscaped social area for pupils. Lighting will be upgraded to this area.
- Hardstanding tennis courts, with associated fencing surrounding the two courts, which will be retained and reused with column lighting installed, to facilitate the use of the tennis courts in the evenings. The tennis courts will also be re-surfaced as they are currently quite tired and dated.
- Hardstanding basketball court, which will be retained and used for basketball and netball and as a social area for pupils. There is no existing lighting or fencing to this court and this will remain the case.
- Two grassed sports pitches, which the London Borough of Richmond upon Thames Playing Pitch Strategy (March 2018) identifies as pitches which should be protected and the Planning Pitch Strategy Action Plan Update (January 2022) confirms that the Council should “Explore

the possibility of community use of the Site once the MoD have disposed of the Site". These grass pitches will be retained, with works undertaken to improve their quality. They will be marked out for use as a football pitch, rugby pitch and cricket field. These pitches are currently not illuminated, and this will continue to be the case.

- Retention of the main hardstanding driveway leading from Kneller Road to the main parade ground, with existing column lighting that illuminates the driveway. The driveway will be used as the main vehicle access and exit with the lighting upgraded, to ensure the route is sufficient lit and safe in the evenings.

5.8 The above are existing features of the Site and are to be retained. These elements of the Site are therefore acceptable and are not considered further in this report. Where lighting is proposed to be introduced or upgraded, it is discussed later in this report.

5.9 Existing development in the MOL where demolition and rebuild or re-use is proposed:

1. Hardstanding area at the far north of the Site, where there are a number of buildings. The majority of buildings will be demolished and replaced with soft landscaping. It is proposed that two single storey buildings will be retained and re-used and part of the hardstanding retained (a third building will be retained but this sits outside the MOL). The retained buildings will be used to store plant and machinery, associated with the Site's energy strategy and as a general site maintenance store, with bin storage. The hardstanding will be retained to enable vehicle access to these buildings and for deliveries.
2. The existing sports hall (Morris Hall) located to the south of the existing basketball court will be demolished and on broadly the same footprint a single storey sports pavilion will be provided. Other buildings in the area surrounding the Morris Hall will be removed.

5.10 The need for the above elements of the scheme are considered further later in this Section, and then subsequently assessed in the context of the NPPF Green Belt policies in Section 7.

5.11 New development in the MOL, comprises of:

1. The all weather pitch (astro turf) hockey pitch with associated fencing surrounding the Site. This pitch will not be illuminated.
2. The pedestrian pathway that will run parallel to the vehicle driveway leading from Kneller Road, which will be illuminated with low level bollards.

5.12 The need for the above elements of the scheme are considered further below, and then subsequently assessed in the context of the NPPF Green Belt policies in Section 7.

1. Energy Centre, Stores and Retained Hardstanding

5.13 It is necessary to accommodate plant and equipment on the Site and also to provide stores for the groundmen, for equipment such as a lawnmower and tools and also as a bin store. Accommodating these in a part of the Site where they can be accessed during the school day by a vehicle, without disturbing the day to day running of the school is important.

5.14 It is proposed to re-use three existing buildings on the far north of the Site for this purpose and to retain an element of hardstanding in this area, so that servicing vehicles can access the stores. One of these building will be located outside the MOL (Building 1), one will be partly in the MOL (57.5 sqm existing within MOL- Building 2) and one will be fully in the MOL (259.4 sqm – Building 3). A modest extension is proposed to the building that is part in the MOL (Building 2) of 75.8 sqm. 25.6 sqm of the extension will sit inside the MOL and 50.2 sqm of the extension will sit outside the MOL. 172.3 sqm of Building 3 will be demolished, leaving only 87.1 sqm of built development. When considering just the build development inside the MOL, the extension to Building 2 will be off-set by the partial demolition of Building 3, resulting in a net decrease in built floorspace. All areas quoted in this paragraph are the GIA floor areas (see Design and Access Statement).

5.15 Consideration has been given to where else the Energy Centre could be located, outside of the MOL, however there is not considered to be another suitable location that would not conflict with the day to day running of the school for the following reasons:

- The scheme seeks to limit vehicle parking and moving vehicles to the edges of the Site and to not bring vehicles into the central parts of the Site where teaching will take place. It would not therefore be possible to have the energy centre in the centre of the Site, in or close to the courtyard area, as it would result in a need for vehicles to have access to this part of the Site during the school day.
- Due to the MOL designation, it would not be appropriate to locate the centre in new build development in the MOL.
- Due to the heritage significance of Kneller Hall and the importance of retaining the parade ground area and front of the Site undeveloped, it would also not be appropriate to position the energy centre at the front of the Site.

- The far western part of the Site is required for vehicle parking and there is dense tree coverage in the northern part of the Site, which is the ecology corridor, so it is also not felt to be appropriate to position the energy centre here.
- If it was positioned in the far south west corner of the Site, adjacent to the teaching block, a significant number of trees would be required to be removed. This would also be too far from the ground source heat pump, which sits under the grassed playing pitches and which the energy centre supports.

5.16 The proposed location, allowing existing buildings to be re-used is therefore considered to be the most suitable location. The proposed strategy also results in a decrease in the extent of overall built development for this part of the Site, containing the built area in a consolidated area, which is considered to be an improvement and to improve the openness of this part of the MOL.

5.17 The design team and M&E consultant has also explored opportunities to reduce the size of the extension required, but to provide the plant with sufficient circulation space to operate and to avoid overheating, this has not been possible. The current location allows existing buildings to be re-used, avoiding demolition and rebuild, which is considered to be a more sustainable approach.

2. Ancillary Sports Pavilion

5.18 The outside sports pitches require changing facilities, showers and WCs, storage for sports equipment and a club room. A single storey sports pavilion is therefore provided to meet this need. The architects have designed this facility in accordance with Sports England and the England and Welsh Cricket Board (ECB) requirements. In the initial written pre-application engagement with Sports England, they confirmed that *“ECB welcome the sports pavilion. This will need to be compliant with ECB Technical Specification 5 (TS5: Pavilions & Clubhouses) – attached, as well as that of Sport England guidance.”*

5.19 The Specification 5 confirms that essential accommodation to support the sports pavilion includes team changing room and showers; toilets for players and spectators; storage; a social and dining room and a kitchen/ servery. An extract of the Specification 5 guidance is detailed below:

Accommodation
The accommodation should meet the current and future needs of the club and can be considered in terms of what is essential or desirable:

Essential	Desirable
Entrance	Reception
Team changing room and showers	Office
Officials changing room and shower	Flexible changing room and shower
Toilets for players, officials and spectators	Additional umpire changing room and shower for multi sport facilities
Provision for first aid	Bar
Social and dining/ tea room	Meeting room
Club room	Secure storage for trophies
Kitchen and servery	External cricket equipment store
Storage	Refuse area
- food and beverages	
- consumables	
- cricket equipment	
- cleaner's equipment	
Plant room	
Grounds equipment store (this can be integral or external – see storage)	
Scoreboard	
Scorer's base	

ECB Technical Specification 5 (TS5: Pavilions & Clubhouses) – Page 31

5.20 The project architects have designed the pavilion in accordance with these standards, whilst being mindful of the location of the development in the MOL. They have therefore provided a single space to be used as a social/ dining/ servery area of 88 sqm. This is considered to be the minimum size needed to ensure that this is still useable for the sports clubs that will use it. When ECB were consulted, they raised that as there was only one cricket pitch, the club room space could be reduced in size. However, it is noted that the club room could also serve other sports using the facilities, or there could be multiple clubs on the Site at one time sharing the space. There is not considered to be scope to further reduce this already modestly sized club room space.

5.21 The changing facilities will be used by the cricket pitch users, but also the football and rugby pitch users. There could be both a football and rugby match taking place at the same time, and therefore it is necessary for 4 changing rooms to be provided, one home and one away changing room for each pitch. Feedback from ECB also raised that a separate officials changing room with one shower and one WC was needed. This has been incorporated into the proposals. This officials changing room, could also be used by officials/ referees for other sports, not only cricket officials.

5.22 The storage room will be used by the school sports teams for storage and also by the local clubs hiring the facilities. The storage space needs to be located proximate to the pitches, so that the equipment doesn't need to be transported far and also to ensure the community groups using the outside pitches needs are self-contained in this part of the Site. In the September 2022 pre-application feedback, ECB commented that the store/ plant room could be consolidated. However,

this store room is not only for the cricket users equipment, it is for other sports also. Therefore, there is not considered to be scope to consolidate it, without compromising other sporting groups needs.

5.23 Feedback from the Football Foundation raised whether there were external toilets available for use. The sports provision provides externally accessible WCs, so that clubs who do not wish to also hire the sports pavilion facilities, also have access to WC facilities, in close proximity to the pitches.

5.24 The layout and need for the floorspace provided within the sports pavilion is discussed further in the submitted ADP Design Document.

5.25 It is necessary for the sports pavilion to be located adjacent to the sports pitches, and therefore within the MOL because:

- The ECB Specification 5 requires players and spectators to be able to see the pitch from the social space inside the pavilion. The written advice from Sports England confirms that the ECB requires at least two of the changing rooms to include a line of sight to the cricket pitch.
- Locating the ancillary facilities for the local schools and community groups using these, close to the sports pitches limits the parts of the Site that they need to use and therefore from a security perspective it is easier to manage and control the use. Community users may be arriving at the Site when there are still after school activities and pupils present on the Site, therefore it is important to be able to keep the different uses separate. The community users will access the Site from Kneller Road up the long driveway, and if they need to drive to the Site will be able to park in the existing hardstanding parking area to the north east of Kneller Hall.
- If users of the grassed pitches needed to walk across the Site, it would result in muddy shoes tramping along pedestrian footpaths used by pupils, who will be moving between the main teaching spaces, throughout the school day resulting in mud moving inside the buildings. It would also result in the 'clean' changing rooms used by the indoor sports facilities becoming muddy.
- If a pupil needs to use the toilet facilities during a PE lesson, they can do this in the sight of the staff member leading the lesson.

3. Sports Pitches

5.26 As set out in the previous section of this report, Dukes Education has identified a need and demand for a senior school in this location. To meet the curriculum requirements and to ensure pupils have

every opportunity to excel in sport, a school requires physical education facilities. These are also needed to provide other benefits to pupils, such as improved health and developing teamworking skills and communication. The submitted Sports Provision Statement submitted with the planning application provides further details of the constraints to the sporting provision available to Radnor House School currently, due to their reliance and need to travel to off site facilities.

5.27 Accordingly, the existing outdoor sports facilities will be enhanced through re-surfacing works and re-levelling ground works to the grassed pitches. Whilst these facilities will be used by the school during the school day, there will also be managed access at evenings and weekends, for other local schools and community groups to use these facilities.

5.28 In addition, an all weather hockey pitch will be provided, together with associated fencing surrounding the Site. This pitch will enable the school to offer Hockey lessons to pupils, and will provide greater flexibility of use than the grassed pitches. The opportunity for the community to utilise this facility in the evenings and at weekends will also be secured through the Community Use Agreement. Demand for this facility has also been identified:

- England Hockey has confirmed that they are supportive of having a hockey facility at the Site;
- Teddington Hockey Club has confirmed that they are interested in pursuing a partnership with the school; and
- The London Borough of Richmond upon Thames Playing Pitch Assessment (March 2018) identifies an undersupply of all weather hockey pitches.

5.29 Fencing will surround the hockey pitch. This will be green steel wire fencing, so that it is not a solid barrier but views through it are possible. The pitch sits just to the south of the existing trees and therefore will be partially screened by this backdrop. In addition, the tennis courts with existing fencing surrounding them, sit immediately to the west of the astro- turf, therefore the new fencing will be read alongside the existing fencing. Following recommendations from the acoustic consultant, the eastern elevation is also required to have an acoustic fence. This will be a wood panelled fence of 3m in height. Climbing plants are proposed to grow up this timber fence and additional tree planting is proposed alongside it. This will help to soften the appearance of the fence.

5.30 There is not space on the Site to accommodate the astro- turf pitch outside of the MOL. It is considered that positioning it in the far northern part of the existing grassed pitches area is the most suitable location, as the existing dense vegetation to the north helps screen it. If it was

positioned further to the south, it would be much more visible as it would not be surrounded by an trees, or close to the existing tennis courts.

4. Pedestrian Pathway

- 5.31 In order to ensure safe access and egress to the Site for pupils, and community users, it is necessary to provide a separate pedestrian pathway leading into the Site and up the main driveway, alongside the vehicle driveway. This pathway is not required to be illuminated itself, as it will be able to utilise the lighting along the vehicle driveway, that it sits adjacent to. The surface will need to be a hardstanding level surface so that it is safe to use for pupils, including less able and disabled users.
- 5.32 A secondary pupil pedestrian access will be located further west along Kneller Road, adjacent to the Guard House. It is not felt to be appropriate for all pupils to use a single access/ egress to ensure the flow of pupils into and out of the Site and along the pavements. The pavement along the section of Kneller Road between these two access points is also quite narrow.
- 5.33 At the entrance to the Site, the pathway is required to slightly diverge away from the main vehicle driveway, in order to avoid existing trees and to ensure that these can be retained and protected. The pathway, at the entrance to the Site, will be partially screened by the trees. For the majority of the length of the pathway, it will appear as an extension to the width of the driveway. When viewed from across the playing fields, it will read as part of the driveway, thereby protecting the openness of the MOL. In addition, additional tree planting is proposed alongside the eastern edge of the pedestrian pathway, further screening it in views across the playing fields.

5. External Lighting Strategy

- 5.34 Cundall has advised on the external Lighting Strategy for the Site. Careful consideration of the Site's location in the MOL and ecology considerations have been factored into the proposals.
- 5.35 The main vehicle driveway and existing hardstanding parking area on the eastern part of the Site are both already illuminated, with lighting columns. Cundall has advised that it is necessary for the lighting to be upgraded, to ensure the safe use of these areas by vehicles when it is dark. Along the driveway, existing lighting columns are positioned 15m apart, Cundall has recommended that the Proposed Development provides then 12- 13m apart, but at the same height of 4m. In the hardstanding area, currently used as parking and proposed to be used as the coach and community use parking, the existing lighting columns are distributed within the centre of the car park with light emitted in 360 degree directions, making the control of illumination negligible. Cundall has recommended lighting columns that provide more uniform lighting. This area will be used by

coaches and community groups when it is dark, and therefore it is necessary for it to have suitable lighting.

5.36 The tennis court is not currently illuminated. It is evident from feedback received from Whitton Tennis Club and the Lawn tennis Association (LTA), via Sports England that providing lighting to these courts will significantly enhance the community's use of them. Please see the submitted Sports Provision Statement, for further details on this. Illumination will also allow the school to use them for after school clubs in the winter months, when it is not possible to use the grassed pitches or astro- turf because these are not illuminated. Cundall's submitted lighting strategy confirms that consideration has been given to minimising the lighting, with respect to number of columns applied and mounting heights in order to mitigate the impact as far as possible. The style of luminaire utilises directional LED precision optics to ensure light is focused only where illumination is required, further ensuring that the impact on surrounding sensitive receptors is minimised.

6.0 RELEVANT PLANNING POLICY

6.1 The relevant LBR Development Plan documents and material considerations comprise of the:

- London Borough of Richmond upon Thames Local Plan (July 2018);
- London Plan (February 2021);
- Kneller Hall Masterplan Supplementary Planning Document (March 2020); and
- National Planning Policy Framework (July 2021) ('NPPF').

6.2 Below we summaries the

London Borough of Richmond upon Thames Local Plan

6.3 Policy LP 13 (Green Belt, Metropolitan Open Land and Local Green Space) highlights the borough's Green Belt and Metropolitan Open Land will be protected and retained in predominately open use.

6.4 The policy also states:

"...Appropriate uses within Green Belt or Metropolitan Open Land include public and private open spaces and playing fields, open recreation and sport, biodiversity including rivers and bodies of water and open community uses including allotments and cemeteries. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt or Metropolitan Open Land.

B. It will be recognised that there may be exceptional cases where inappropriate development, such as small scale structures for essential utility infrastructure, may be acceptable.

C. Improvement and enhancement of the openness and character of the Green Belt or Metropolitan Open Land and measures to reduce visual impacts will be encouraged where appropriate...."

6.5 The supporting text within Paragraph 5.2.1 identifies the policy applies equally to Green Belt or Metropolitan Open Land, confirming the Green Belt paragraphs within the NPPF as also applying equally to MOL. Whilst the reference paragraphs relate to the first edition of the NPPF (published March 2012), it confirms the guidance related to acceptable development in the Green Belt as being relevant.

London Plan

- 6.6 The MOL designation features within the adopted Local Plan for the LB Richmond and is an allocation set out within the London Plan, the strategic plan which guides all development plans within the Greater London Area.
- 6.7 The latest version of the London Plan was adopted in February 2021 and Policy G3 ('Metropolitan Open Land') provides the overarching guidance for MOL, stating MOL is afforded the same status and level of protection as Green Belt land, and that:
- A. MOL should be protected from inappropriate development in accordance with National planning policy tests that apply to the Green Belt.
 - B. Boroughs should work with partners to enhance the quality and range of uses of MOL.
- 6.8 Within the supporting text of the aforementioned policy, the London Plan states:

"Proposals to enhance access to MOL and improve poorer quality areas such that they provide a wider range of benefits for Londoners that are appropriate within MOL will be encouraged. Examples include improved public access for all, inclusive design, recreational facilities and landscaping improvement.

- 6.9 Whilst the London Plan does not provide specific guidance for determining applications within the MOL, the MOL is afforded the same status and level of protection as Green Belt land and London Plan Policy G2 (London's Green Belt) states:

"The Green Belt should be protected from inappropriate development:

1) development proposals that would harm the Green Belt should be refused except where very special circumstances exist,

2) subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.

National Planning Policy Framework

- 6.10 The NPPF (2021) provides a clear direction for the management of development within the Green Belt. Paragraph 147 advises that inappropriate development is, by definition, harmful to MOL and should not be approved except in very special circumstances (VSC).
- 6.11 When considering the level of protection afforded by the Green Belt, Paragraph 149 of the NPPF states:

“A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

.....

b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;....”

6.12 It is noted that the NPPF (149) refers to the provision of ‘appropriate’ facilities for outdoor sport as exceptional development, rather than ‘essential’ facilities as was the case previously in the Green Belt Planning Policy Guidance (PPG2). The term ‘essential’ implies that the proposed facility should be necessary to the functioning of a specific outdoor activity. The word ‘appropriate’ implies that the use should be suitably linked, which it is not as stringent as the previous requirement.

6.13 Paragraph 150 states that:

“Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

....

d) the re-use of buildings provided that the buildings are of permanent and substantial construction;

e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); ...”

Kneller Hall SPD

6.14 The purpose of the Kneller Hall Masterplan SPD (the SPD) is to guide the future development of the Site, including the uses it could support, so that it can support the vitality and viability of the local area as a whole. At the time of writing, the SPD envisioned the Kneller Hall Site to be re-developed to predominantly provide new residential dwellings, in addition to providing employment/community uses within Kneller Hall. As part of this, the SPD envisioned the playing

fields as becoming a publicly assessable park. Whilst the proposed use of the Kneller Hall Site differs, the guidance with regards to management of the MOL remains applicable.

6.15 The SPD sets out:

“The land to the east of the Site is protected by Metropolitan Open Land (MOL) designation and is of high historical and communal value as it provides part of the setting to the Grade II listed Kneller Hall. The MOL designation not only safeguards this strategically important open space but also encourages improvements to its quality and accessibility”

6.16 However, when considering the Site’s constraints and opportunities, the SPD outlines:

“New built development is restricted to land outside the MOL. The Parade Ground of Kneller Hall is also to be kept free from development. There is an opportunity to focus development in the western part of the Site enclosed by the boundary wall. In addition, there is an opportunity to consolidate and re-provide the current built footprint within the MOL in a new building, subject to scale, massing and impact on character and openness.”

6.17 When considering the strategy for the MOL area, it is stated:

“There are a number of existing buildings and structures within the MOL which do not have any historic or architectural value. Under Local Plan Policy LP 13 there is a potential opportunity to re-provide the buildings in a consolidated footprint, which enhances the sense of openness of the MOL”

6.18 As such, when considering built development within the MOL, the SPD sets out:

“The existing poor quality, scattered buildings within the MOL should be removed and there may be potential to re-provide the existing footprint into a single building subject to complying with Local Plan Policy LP 13 in terms of use and impact on the character and openness of the MOL. Historically this area was clear of buildings and taking such an approach is likely to contribute to the enhancement of the setting and appreciation of Kneller Hall, opening up views across the Park and enhancing the approach from the Lodge Gate. Such an approach could also contribute to improving the openness of the MOL.

If such an approach can be justified then any detailed design should assess the most appropriate location, with consideration of the setting and views to Kneller Hall, accessibility, and retention of existing hedgerows and trees and to encourage use of the facilities by residents and users of the Park.”

7.0 CASE LAW

7.1 We set out below decisions relevant to the Proposed Development, when considering the interpretation of relevant policy wording applicable to MOL and Green Belt decisions. As identified in the previous section, MOL is afforded the same status and level of protection as Green Belt land, therefore the Case Law relating to the definition of ‘appropriate development’ and ‘openness’ are applicable.

Highfield School, Letchworth Garden City (2015)

7.2 In this appeal decision (ref: APP/X1925/A/14/2221199), the Inspector provided clarification on the interpretation of ‘openness’ when re-providing floorspace/footprint within the Green Belt associated with new educational facilities.

7.3 When considering the impact on openness, the Inspector agreed with the LPA’s decision that there would be no material harm on the openness of this part of the Green Belt where there was a reduction in building footprint across the Green Belt.

“The appeal scheme comprises redevelopment of a previously developed Site. Whilst the total floor space to be provided would be some 119 square metres greater than existing, the overall building footprint would be reduced by some 2029 square metres. Moreover, the height of the buildings proposed would, for the most part, be no greater than the existing buildings on the Site (the exception being two three-storey elements which would be 1.73 metres higher than the existing three storey building). I agree with the Council therefore, that there would be no material harm to the openness of this part of the Green Belt, or to the purpose of including land in it. Accordingly, the scheme would not comprise inappropriate development...”

Lee Valley Regional Park Authority v Epping Forest DC (DC [2016] EWCA Civ 404, Treacy, Underhill, Lindblom LJ)

7.4 In this case, clarification was provided on how Paragraph 89 (now 149) of the NPPF should be read in conjunction with other Green Belt policy within the NPPF;

“The first sentence of paragraph 88 of the NPPF must not be read in isolation from the policies that sit alongside it. The correct interpretation of it, I believe, is that a decision-maker dealing with an application for planning permission for development in the Green Belt must give “substantial weight” to “any harm to the Green Belt” properly regarded as such when the policies in paragraphs 79 to 92 are read as a whole (consistent with the approach taken, for example, in the judgment of Sullivan L.J., with whom Tomlinson and Lewison L.J.J. agreed, in Redhill Aerodrome Ltd. v Secretary of State for Communities and Local Government [2015]

P.T.S.R. 274 , at paragraph 18). Reading these policies together, I think it is quite clear that “buildings for agriculture and forestry”, and other development that is not “inappropriate” in the Green Belt, are not to be regarded as harmful either to the openness of the Green Belt or to the purposes of including land in the Green Belt. This understanding of the policy in the first sentence of paragraph 88 does not require one to read into it any additional words.

If the policy in the first sentence of paragraph 88 of the NPPF meant that “substantial weight” must be given to the effect a proposed agricultural building would have on the openness of the Green Belt and on the purposes of including land within the Green Belt, the policy in paragraph 89 categorizing such buildings as appropriate development in the Green Belt, regardless of such effects, would be negated. This cannot have been the Government’s intention.”

- 7.5 This interpretation identifies that should a proposal benefit from an exemption under Paragraph 89 (now 149), then no further burden of proof can be required by the remaining Green belt policy in the NPPF. As such, should the development proposals satisfy the relevant exemption under Paragraph 149, the precedent would be wholly applicable:

“the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it”

A W Lymn and Gedling Borough Council

- 7.6 Mr Justice Green stated in the Judicial Review related to A W Lymn and Gedling Borough Council:

“It is apparent that it construed paragraph 89 as treating cemeteries as “appropriate” (provided they met the limited test contained therein). However, paragraph 89 is not concerned with cemeteries per se but with the construction of “new buildings” which provide appropriate facilities for cemeteries. The two are clearly different. Thus, for example, paragraph 89 might address toilet facilities, or a cafeteria or a car park which serves a cemetery. But it is not concerned with the cemetery itself. The structure of paragraph 89 makes this clear. It creates a prima facie rule namely that the construction of new buildings is inappropriate. It then states that there are certain “Exceptions to this”. Amongst the exceptions are the “...provision of appropriate facilities for...cemeteries...”. In my judgment the Defendant erred in treating the exception as applying to the cemetery as opposed to a new building which provided facilities to serve the cemetery.”

7.7 This case relates to a cemetery, that is within the same subtext as outdoor sports and recreation within Paragraph 149 of the NPPF.

7.8 Mr Justice Green clarifies that Paragraph 89 (now 149) applies to new buildings which 'serve' the subject of the exemption. Whilst in this case it relates to a cemetery, given the use is within the same paragraph of the NPPF it is conserved applicable to outdoor sports and recreation as they are covered by the same exemption. Consequently, Paragraph 149 relates to new buildings which serve outdoor sports and recreation.

Turner (2016) (EWCA Civ 466, Arden, Floyd and Sales LJ)

7.9 In this case, the Inspector provided clarification on the interpretation of 'openness' and factors which can be seen to influence this concept;

"The concept of "openness of the Green Belt" is not narrowly limited to the volumetric approach suggested by [Previous ruling by Mr Rudd]. The word "openness" is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs (in the context of which, volumetric matters may be a material concern, but are by no means the only one) and factors relevant to the visual impact on the aspect of openness which the Green Belt presents.

The question of visual impact is implicitly part of the concept of "openness of the Green Belt" as a matter of the natural meaning of the language used in para. 89 of the NPPF. I consider that this interpretation is also reinforced by the general guidance in paras. 79-81 of the NPPF, which introduce section 9 on the protection of Green Belt Land. There is an important visual dimension to checking "the unrestricted sprawl of large built-up areas" and the merging of neighbouring towns, as indeed the name "Green Belt" itself implies. Greenness is a visual quality: part of the idea of the Green Belt is that the eye and the spirit should be relieved from the prospect of unrelenting urban sprawl. Openness of aspect is a characteristic quality of the countryside, and "safeguarding the countryside from encroachment" includes preservation of that quality of openness."

7.10 The Inspector clarifies that openness does not relate purely to the volumetric size of development, but rather it is subject to a number of considerations, the most prominent being the extent to which the Green Belt is developed.

7.11 More recently, in Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council [2020] the findings of Sales LJ in Turner (2016) were not disputed.

Europa Oil and Gas vs Secretary of State for Communities and Local Government, Surrey County Council and Leith Hill Action Group

7.12 Lord Justice Richards stated during this Judicial Review:

“considerations of appropriateness, preservation of openness and conflict with Green Belt purposes are not exclusively dependent on the size of buildings or structures but include their purpose. For example, paragraph 89 of the NPPF treats a house differently from a sports pavilion: the Green Belt is necessarily harmed by one but is not necessarily harmed by the other.”

7.13 Lord Justice Richards also stated:

“the judge said that the premise of paragraph 17 of the inspector's decision was that exploration for hydrocarbons cannot be appropriate development in the Green Belt, whereas any correct analysis of the proviso to paragraph 90 of the NPPF has to start from the different premise that exploration can be appropriate, i.e. that there is nothing inherent in such development that would necessarily compromise the objectives in the proviso. Were it otherwise, the proviso would always negate the appropriateness of such development in the Green Belt and would simply make the policy pointless.”

7.14 This provided additional justification that size of buildings or structures alone is not a reason to judge a development as ‘inappropriate’ in relation to paragraph 149 of the NPPF. Whilst this relates to paragraph 90 (now 150) of the NPPF, it identifies in principle, there is nothing inappropriate about development gaining an exception under paragraphs 146 (or 149 or 150). Thus, a policy position relating to development for facilities for outdoor sport and / or recreation under paragraph 149 should begin by accepting that such development ‘can’ be appropriate.

8.0 POLICY ASSESSMENT

- 8.1 As identified previously in this assessment, when considering the level of protection afforded by the Green Belt, Paragraph 149 of the NPPF states:

“A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. The exemptions are:.....

b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;....”

- 8.2 Paragraph 150 of the NPPF confirms that the re-use of buildings, provided that the buildings are of permanent and substantial construction is *“also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it.”*

- 8.3 Local Plan Policy LP 13 (Green Belt, Metropolitan Open Land and Local Green Space) identifies that Green Belt and Metropolitan Open Land are afforded the same level of protection and paragraphs within the NPPF as also applying equally to MOL.

- 8.4 Below we set out the assessment of the proposed sports pitches and ancillary facilities against the aforementioned requirements of the NPPF.

Change of Use of an Existing Building

- 8.5 The buildings proposed to be converted to use for the storage of energy plant and equipment and equipment for the groundsmen are buildings of permanent and substantial construction, that sit on the edge of the MOL and are currently surrounded by a number of other buildings which will be removed. These are small buildings as detailed below:

EXISTING BUILDINGS	FOOTPRINT (SQM)	HEIGHT (M)	VOLUME (M3)
Energy Centre (Building 2) Extent of Development in MOL Only	63.2	2.73	172
Grounds Maintenance (Building 3)	288.2	3.2	922.24
Total	351.4		1,094.24

PROPOSED ALTERATIONS	FOOTPRINT (SQM)	HEIGHT (M)	VOLUME (M3)
Energy Centre (Building 2) Extent of Development in MOL	91.82 (includes 28.0 Extension in MOL)	3.8	348.9
Grounds Maintenance (Building 3)	96.7	3.2	309.44
Total	188.52		658.35
Total Change from Existing	99.68 Reduction		435.89 Reduction

(See submitted Proposed Energy Centre Plans for further details)

- 8.6 Converting these existing single storey and small buildings is a sustainable solution as it allows an existing building to be re-used. It is also not inappropriate development, and is in accordance with part d) of paragraph 150 of the NPPF which states that development in the MOL is not inappropriate if it constitutes “*the re-use of buildings provided that the buildings are of permanent and substantial construction*”.

- 8.7 Paragraph 149 of the NPPF also confirms that *“the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building”*. is also not inappropriate development in the MOL. The extension to Energy Centre 2 will only have a footprint inside the MOL of 28 sqm, increasing the existing footprint in the MOL of this building from 63.2 sqm to 91.82 sqm (45% increase). The extension to Building 2 results in the building become slightly wider. This extension is screened from views from the east and west by the other two buildings proposed to be retained in this part of the Site. It will therefore preserve the openness of the MOL.
- 8.8 The NPPF does not provide a guide on what percentage increase would be considered disproportionate, rather an objective assessment is needed based on the circumstances of the case. When considering this cluster of buildings as a whole and assessing the proposals cumulatively, the proposed extension/ alterations and the removal of ad-hoc buildings adjacent to the proposed extension, would result in a decrease in built development in this part of the Site. Consolidating the built development in a much smaller area, rather than it being spread out, across a larger area is considered to be preferable. The small extension will have no impact upon the existing character of this section of the Site. It will result in a much neater arrangement to the built form, allowing not only the built development but also the extent of hardstanding to reduce.
- 8.9 An alternative approach to this modest extension would be to instead retain a further building in this part of the Site, to house some of the energy equipment. It is necessary for the energy equipment to be located in the same part of the Site. The energy equipment would then be spread out over 3 buildings. This would result in greater floor area in the MOL being retained, than the current strategy proposes. The current proposal is therefore considered to better preserve and enhance the openness of the MOL.
- 8.10 Therefore, when viewed in the context of the wider site as a whole, and considering the re-use of existing buildings, the extension is not considered disproportionate or in conflict with the NPPF. A number of buildings in this part of the MOL will also be removed, which helps enhance the openness of this part of the MOL.

An Appropriate Facility

- 8.11 The case previously set out in Section 6 identifies that Mr Justice Green clarified that new buildings providing facilities serving existing outdoor sports and recreation are appropriate.
- 8.12 The eastern part of the Site was used by the previous occupier for outdoor sport and recreation, they had a sport hall and sports pavilion located within the MOL associated with the sports uses.

This use is proposed to continue. The Proposed Development comprises of upgraded outdoor sports pitches, and the introduction of an additional all weather hockey pitch, with associated facilities to support this use. A sports pavilion will be provided to provide changing and welfare facilities, associated with the recreational use of the MOL.

8.13 Fencing will be positioned around the astro turf pitch; lighting will be installed to serve the tennis court and a new pedestrian pathway will improve accessibility of the facilities for local schools and community groups. The need for these facilities to support the functioning of the outside sport pitches was discussed at Section 4.

8.14 We therefore are of the view that the Proposed Development represents appropriate facilities within the MOL, as they support its continued and enhanced use for outdoor recreation and are therefore appropriate development in principle.

Preserves the Openness

8.15 There is no specific guidance for assessing whether the Proposed Development preserves the openness of the MOL. Openness is both a spatial and visual concept and does not solely relate to floorspace/footprint.

8.16 Notwithstanding, the method for assessing Landscape and Visual Impacts to satisfy The Environmental Impact Assessment (EIA) Regulations is often considered appropriate guidelines to the concept of assessing openness. As such, for the purpose of this assessment we propose to use the below considerations:

- Use
- Intensity of overall development prior to / following the proposal
- Visual Amenity and Landscape Character
- Volume
- Enhancement and Accessibility
- Preservation

8.17 The above is based on the objectives of the Green Belt set out in the NPPF.

Use

- 8.18 The use of the new buildings and structures proposed in the MOL as part of this application seeks to provide ancillary facilities for the enhanced outdoor sporting pitches proposed, as part of the new school. These facilities will also be used by local schools and community groups.
- 8.19 The proposed use is considered in accordance with Paragraph 149 of the NPPF, Policy G3 of the London Plan and Local Plan Policy LP 13.
- 8.20 We therefore are of the view the proposed use of the development inside the MOL does not fail to preserve the openness of the MOL.

Intensity of overall development prior to / following the proposal

- 8.21 In Turner 2016, when addressing factors which may influence openness, the Inspector stated:

“Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs”

- 8.22 Furthermore, in the Highfield School appeal decision (2015) when considering the impact on openness, the Inspector concluded:

“The appeal scheme comprises redevelopment of a previously developed site. Whilst the total floor space to be provided would be some 119 square metres greater than existing, the overall building footprint would be reduced by some 2029 square metres. Moreover, the height of the buildings proposed would, for the most part, be no greater than the existing buildings on the site (the exception being two three-storey elements which would be 1.73 metres higher than the existing three storey building). I agree with the Council therefore, that there would be no material harm to the openness of this part of the Green Belt, or to the purpose of including land in it”

- 8.23 The Proposed Development seeks to demolish the more modern ad-hoc buildings located within the MOL. There will be a total reduction in the built footprints within the MOL of 659 sqm. As such, the Proposed Development will result in a significant reduction in the number of structures and quantum of development within the MOL.
- 8.24 All existing structures in the MOL are single storey, and this will continue to be the case. The replacement sports pavilion will not exceed the height of the existing sports buildings on this part of the Site or their footprint. ADP has confirmed that:

- The footprint of the 4 buildings around the existing basketball court is approximately 495sqm, with the Morris Hall approximately 312 sqm footprint. This building has a 3.2m tall section to the north, with a 5.65m block to the south. Existing volume = 1,534 m3
- The proposed pavilion is 351.5 sqm footprint sited in the same orientation as the existing building and it is 3.8m tall to the West and a 4.6m tall to the East. Proposed volume = 1,467 m3

8.25 The positioning of the sports pavilion, on the footprint of an existing building and close to Kneller Hall on the western edge of the sports pitches arguably reduces the visual intensity of development, when the MOL is viewed from sightlines into the Site from the south east and eastern boundaries. A photograph of the Site model that has been prepared is detailed below, which further demonstrates that the openness of the MOL is retained (it is noted that the fencing serving both the tennis courts and astro- turf is not represented on the model, nor is the majority of the proposed additional tree planting):



8.26 A number of views looking towards the sports pavilion are assessed within the Visual Impact Assessment (Chapter 6 of the Heritage Statement). These demonstrate that the openness of the MOL will be retained. The visual below, looking west to the sports pavilion is assessed in the Visual Impact Assessment. It states that this view, as existing, due to the plain building design it makes a neutral contribution to this view. In the Proposed Development, the pavilion's scale is discrete and maintains views of the Listed building, as experienced beyond the presence of clusters of trees. Its high quality design further enhances the setting of the Listed hall and its low massing supports its subordinate role within both the setting of the Listed building and the designated area of MOL.



Figure 6.29 Existing



Figure 6.30 Proposed

8.27 Therefore, when considering the intensity of development, we are of the view that there would be no material harm on the openness.

Visual Amenity and Landscape Character

8.28 In Turner 2016, when addressing factors which may influence openness, the Inspector stated:

“The word “openness” is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. [including] ...factors relevant to the visual impact on the aspect of openness which the Green Belt presents.”

8.29 The Inspector also stated:

“The question of visual impact is implicitly part of the concept of “openness of the Green Belt”

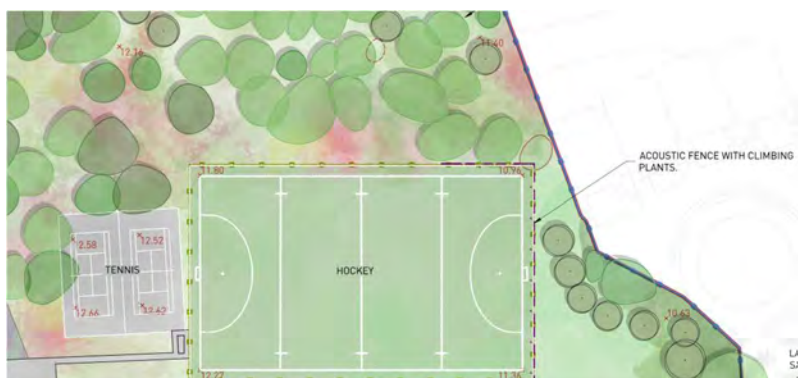
8.30 And:

“Greenness is a visual quality: part of the idea of the Green Belt is that the eye and the spirit should be relieved from the prospect of unrelenting urban sprawl.”

8.31 When considering the visual amenity, the Proposed Development seeks to remove a large percentage of ad-hoc development within the MOL, which shall improve the visual amenity of the

MOL. Given the overall reduction in building footprint within the MOL, the development could not be considered urban sprawl and the sports pavilion will be designed with materials which complement the MOL's visual amenity. The proposed landscaping scheme helps enhance the existing landscaping qualities of the MOL, introducing additional tree planting and planting to further enhance the existing greening across the Site.

8.32 It will be necessary for the hockey pitch to have fencing surrounding it, to meet the Sports England and England Hockey requirements. Green steel wire fencing will be used, to limit the visual impact of this and so that it blends into the surrounding greening. Along the eastern elevation, the acoustic consultant has recommended that a 3m close boarded timber fence should be installed, to reduce noise outbreak. This will only be required on the eastern elevation, which sits very close to the existing site boundary. As the extract from the landscape plan below shows, the landscaping strategy introduces climbing plants on the fence and additional tree planting to the east of the pitch, to further soften this fencing's visual appearance.



8.33 The location of the sports pitches and their ancillary development (including the sports pavilion) are situated in the same area of the existing pitches and their associated structures. Therefore, the character of this part of the MOL is to remain the same. When considering any impacts on visual amenity of this part of the MOL, views into this location are from the south east and east of the Site from outside of the school grounds. Whilst it is the Proposed Development will be visible from these locations, the development will have a contextual relationship with the Kneller Hall site, which shall also be visible, located behind the development in the MOL.

8.34 When viewed from Kneller Road, the astro- turf pitch and associated fencing will be viewed in the backdrop of the dense tree covering that covers the norther extent of the Site. The use of green fencing will help this addition to blend into its surroundings. Furthermore, a large percentage of the MOL will remain open and undeveloped affording unrestricted views into the MOL. We note however some of these views will be transient and fleets when passing the Site and during the summer months they will be partially obscured by foliage. The photos below, show the existing views from Kneller Road, looking northwards into the Site towards the playing fields, with the location of the proposed astro-turf at the rear of the image.



8.35 As such, on balance the proposal as a whole will contribute towards increasing the openness of the MOL. It is acknowledged that the astro- turf pitch and associated fencing will lead to a small reduction in the openness of this part of the MOL, but for the reasons set out above this is considered to be a minimal impact, and that location and associated landscaping strategy help to mitigate the impact. It is also a facility for outside recreation, and therefore not inappropriate development in the MOL.

Volume

8.36 The table below illustrates that there will be a net decrease in built development, floorspace and hardstanding within the MOL, as a result of the Proposed Development:

	Building Footprints (sqm)	Built Floorspace (GIA) (sqm)	Built Volume (sqm)	Hardstanding (Excluding Buildings) (sqm)
Existing Total	1,197	1,032	2,544	6,448
Proposed Total (including floorspace to be retained and converted)	538	484	1,453	5,808
Net Decrease	659	548	1,091	640

8.37 There will also be a significant decrease in the volume of built development in the MOL. All the existing buildings to be removed are single storey.

8.38 As confirmed above, the height of the replacement sports pavilion will be no greater than the height of the existing building (Morris Hall) that it replaces. ADP has confirmed that the existing volume of the Morris Hall building to be removed is 1,534 m3 and the proposed sports pavilion volume is 1,467 m3.

8.39 No other new buildings are proposed in the MOL.

8.40 The proposed Sports Centre will sit just outside of the MOL. The eastern accommodation block also sits on the boundary of the MOL. These buildings similarly enclose the MOL, as the extracts below from the existing and proposed site plan show.



Existing

Proposed

8.41 There is existing dense tree covering, to the east of these buildings, which will be retained and which serves to partially screen the building. It is considered that the proposed high quality sports centre building, is more architecturally sympathetic design, than the existing accommodation blocks. There will also be a green roof on the new building. Consideration has been given to the architectural detailing on the west elevation, as well as the use of glazing to create outlook from the building into the MOL, to enable the MOL to be enjoyed by those using the swimming pool. It is therefore considered that the Sports Centre building will not have a detrimental visual impact on the MOL, when considered in the context of the existing build development.

Enhancement and Accessibility

8.42 Local Plan Policy LP 13 states:

“Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt or Metropolitan Open Land.”

8.43 And,

“Improvement and enhancement of the openness and character of the Green Belt or Metropolitan Open Land and measures to reduce visual impacts will be encouraged where appropriate.”

8.44 We also highlight that NPPF paragraph 145 states:

“Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land”

8.45 The proposed redevelopment of the Kneller Hall site to provide a new school provides a key opportunity to provide access and enjoyment of the MOL for generations of students. It also provides an opportunity for local people to access these facilities, and this will be facilitated through the Community Use Agreement. Without the educational investment into the Site by Dukes Education, it is unlikely that the enhanced outdoor sporting facilities would be provided.

8.46 A key part of the proposals is to improve the contribution the new school makes towards not only preserving (see below) but also improving and enhancing opportunities for access to the MOL, by providing new sporting facilities which shall be used by a wider range of local residents and

students. The landscape strategy has played a key role in the design development, with the scheme seeking to introduce additional tree planting and greening across the Site, including in the MOL.

Preservation

- 8.47 The preservation of the openness of the MOL is noted within Paragraph 149 of the NPPF and Local Plan Policy LP 13 seeks both the “improvement and enhancement of the openness and character of the Metropolitan Open Land”.
- 8.48 As touched on previously, the Proposed Development within the MOL is required to facilitate the use of the outdoor sporting facilities proposed. This use is key towards the preservation of the MOL as it ensures the space continues to be used for outdoor sports, and enjoyed by pupils and local community groups that use it. The school and its role with the preservation of the MOL is therefore inherently linked and crucial for its preservation going forward.
- 8.49 Furthermore, the preservation of the openness also relates to more than the literal physical elements of the MOL. As this part of the MOL shall fall within the boundaries of the new school, it shall be their responsibility to maintain and preserve the MOL’s quality through continued maintenance. A Landscape Management Plan has been submitted as part of the application. Furthermore, the primary use of the MOL for educational purposes shall ensure it is preserved from other uses (such as housing) and retained as MOL in future Local Plan reviews.

Conclusion

- 8.50 The above review has been undertaken using accepted EIA methodology and we have reviewed areas that reflect the definitions of openness. Our assessment demonstrates that the Proposed Development, when considered as a whole and in the context of the wider planning application contribute towards preserving the openness of the MOL, in both a quantitative and qualitative nature.
- 8.51 It is acknowledged that the introduction of the astro-turf and associated fencing will have a small impact on the openness of this part of the MOL. It is however an appropriate use in the MOL and there is an identified need for the facility, both for the school and wider community.
- 8.52 It is also acknowledged that when considered the existing and proposed floor area inside the MOL of Energy Centre- Building 2 only there is a 28.5 sqm increase. However, when considering the buildings in this part of the Site as a whole, there is a significant net decrease in built development, the built floorspace is consolidated and the openness of the MOL is improved.

8.53 The utilisation of the MOL by the new school proposed by Dukes Education and Radnor House School Limited shall ensure the continued maintenance, preservation and enjoyment of the MOL for future generations and it is conserved the proposals on balance preserve the openness of the MOL.

Very Special Circumstances (VSC)

8.54 The NPPF confirms that inappropriate development in the Green Belt and MOL, will not be approved except in VSC and that VSC will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

8.55 Earlier sections of this report have sought to demonstrate that the Proposed Development, when considered as a whole, does not result in inappropriate development in the MOL, for the vast majority of the Proposed Development. Notwithstanding this, were there to be inappropriate development, it is considered that VSC exist to justify the elements of development proposed:

- The Proposed Development in the MOL is required to support the safe functioning of the school and the proposed community use, and to ensure people and vehicles can move into and out of the Site without conflict arising. For example, a designated pedestrian pathway from Kneller Road, alongside the vehicle driveway and replacement lighting to the driveway and hardstanding parking area.
- There is demand from Whitton Tennis Club to use the facilities and both Whitton Tennis Club and the LTA have identified that the introduction of lighting to these existing tennis courts will significantly enhance the community's ability to benefit from this facility, throughout the year. Without this lighting, it limits the opportunities for community use. It also restricts the opportunities for the school to use this facility, after school in the winter months.
- There is an identified need for all weather pitches in the borough and strong interest from Teddington Hockey Club to form a partnership with the school, to enable them to benefit from the community access. The fencing is required around the pitch, to meet the Sports England and England Hockey guidance and acoustic fencing is required to protect neighbour's amenity from the use of the astro- turf pitch. This facility will be able to be used by the school during the school day, and by local community groups in the evenings, at weekends and in school holidays. It facilitates outside sports at times of the year when due to high rainfall it may be necessary to limit the use of the grassed pitches.

- The 28.5 sqm extension to Energy Centre Building 2 is required to enable the plant and equipment, associated with the Site's energy strategy to be consolidated in this building and Energy Centre Building 1, which sits outside the MOL. If the plant and associated equipment was spread out across a larger number of existing buildings in this part of the Site, it would result in a greater quantum of built development in the MOL. It would require the part of Building 3 proposed to be demolished, to be retained, or require another building in this part of the Site, that will be demolished, to be retained. This would not enable the openness of the MOL to be enhanced in this part of the Site. The proposed approach allows the built development in this part of the Site to be consolidated, allowing an overall net reduction in floor area and volume in this part of the Site, which enhances the openness of the MOL. Furthermore, the Kneller Hall SPD acknowledges that *"There are a number of existing buildings and structures within the MOL which do not have any historic or architectural value. Under Local Plan Policy LP 13 there is a potential opportunity to re-provide the buildings in a consolidated footprint, which enhances the sense of openness of the MOL."* The strategy aligns with this approach. The small additional footprint of 28.5 sqm also supports the delivery of the site- wide energy strategy, which delivers a low carbon and energy efficient energy network. This approach is supported by local and national policy.

Therefore, whilst it is DWD's view that the Proposed Development does not amount to inappropriate development, for the vast majority of the development, or impact the openness of the MOL; regardless of this, it is considered that VSC exist and that the education and community benefits associated with the scheme, outweigh any potential limited harm.

9.0 SPORTS ENGLAND

9.1 Sport England oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field and remains undeveloped, or
- land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.

9.2 The five specific exceptions set out by Sports England are set out below:

E1 A robust and up to date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.

E2 The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.

- result in the loss of other sporting provision or ancillary facilities on the site; or
- prejudice the use of any remaining areas of playing field on the site.

E3 The proposed development affects only land incapable of forming part of a playing pitch and does not:

- reduce the size of any playing pitch;
- result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
- reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
- result in the loss of other sporting provision or ancillary facilities on the site; or
- • prejudice the use of any part of a playing field and any of its playing pitches.

E4 The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements.

E5 The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

-
- 9.3 Similar protection of playing pitches is set out at paragraph 99 of the NPPF, with part c) of paragraph 99 confirming that an exception to the protection of playing fields is where the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
- 9.4 The Proposed Development is not considered to prejudice the use of the playing pitches, as the Applicant's intention is to enhance the outside sports facilities at the Site, and to provide wider access to them, than existing.
- 9.5 The Proposed Development will:
- Retain two full sized grassed pitches at the Site together with run-off areas. It will improve the pitches condition for sport, through works to level and re-turf the pitches. Specialist input is being received on this, as well as the longer- term management of the pitches. There will be flexibility in the line markings of these pitches, enabling use for both football and rugby and also smaller sized pitches for youth teams and for athletics and other sports/ recreation purposes.
 - Retain a cricket pitch at the Site, which will be of an improved quality as set out above.
 - Retain two tennis courts at the Site and improve the quality of these through upgrade and re-surfacing works.
 - Introduce improved ancillary facilities for the playing pitches, including changing and WC facilities.
 - Introduce an Astro- turf pitch (97.4m x 61m), creating opportunities for a wider range of sports to take place on the land by both the school and community groups and enhancing opportunities for all- rear round outside sports, including in wet weather.
 - Introduce community access opportunities.
- 9.6 The Proposed Development will provide the same quantum of useable sports pitches as existing (2 grassed pitches, two tennis courts and a cricket pitch). It will also facilitate space to accommodate the astro- turf pitch, which will provide a further outdoor facility for sport at the Site.

10.0 CONCLUSIONS

- 10.1 We consider that the majority of development proposed in the MOL passes each part of this policy test and we thus contend that the proposed sports pitches and ancillary development, including facilities in the sports pavilion, are considered 'appropriate development' in MOL, under the exemption offered by paragraph 149 and 150 of the NPPF, and therefore consistent with the Local Plan and London Plan.
- 10.2 It is acknowledged that the introduction of the astro-turf and associated fencing will have a small impact on the openness of this part of the MOL. It is however an appropriate use in the MOL and there is an identified need for the facility, both for the school and wider community. The small extension to Energy Centre Building 2 has also been justified in this report. It is considered that VSC are demonstrated for these elements of the development. When considering the remainder of the development within the MOL, it is considered to be 'appropriate development', which preserves the openness and therefore it is not necessary to demonstrate the VSC required by paragraph 148 for inappropriate development. Notwithstanding this, this report considers that if they were required to be justified, then there is VSC to justify the development.
- 10.3 The Proposed Development will result in a net decrease in footprint, floorspace, volume and hardstanding within the MOL. It will consolidate the existing piecemeal and scattered development that sits in the MOL currently. Where new build replacement development is proposed, it will be high quality and thoughtfully designed building, appropriate to its setting. A well-considered landscaping strategy is also proposed to support and enhance the development. The Proposed Development, when considered as a whole, is therefore considered to result in an improvement in the openness of the MOL, including views within and into the MOL land.



APPENDIX 1: EXISTING SITE PLAN



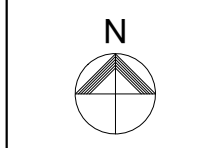
NO	ASSET DESCRIPTION
OMB	KNELLER HALL MAIN BUILDING
001	ACCOMODATION BLOCK 1
002	ACCOMODATION BLOCK 2
003	BANDSTAND
004	GUARD ROOM/OFFICES
005	PROFESSORS ADMIN OFFICES
005A	DISABLED TOILET
007	LIBRARY
008	MORRIS HALL
009	NAAFI
010	BAND PRACTICE ROOM
011	ROOMS STORES
12A	TEACHING ROOMS/PROFESSORS OFFICES
12B	PERCUSSION BLOCK
12C	PRACTICE ROOMS
013	SPORTS PAVILION
15A	GARAGES 1-6
15B	GARAGES 7-12
15C	GARAGES 13-16
016	GYM (RMSM FITNESS CENTER)
16A	DUTCH BARN(RMSM FITNESS CENTER)
020	GROUNDMANS BUILDING
027	LODGE GATE GUARD POST
022	SQUASH COURT
023	OLD PRI SHOP
124	NEW SHOP AND TICKET OFFICE
025	CRT PORTACABIN
026	WICKET GATE GUARD POST
028	CHAIR STORE

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KEYPLAN

NO.	ASSET DESCRIPTION
001	ACCOMODATION BLOCK 1
002	ACCOMODATION BLOCK 2
003	BANDSTAND
004	GUARD ROOM/OFFICES
005	PROFESSORS ADMIN OFFICES
005A	DISABLED TOILET
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008	MORRIS HALL
009	NAAFI
010	BAND PRACTICE ROOM
011	ROOMS STORES
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15B	GARAGES 7-12
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023	OLD PRI SHOP
124	NEW SHOP AND TICKET OFFICE
025	CRT PORTACABIN
026	WICKET GATE GUARD POST
028	CHAIR STORE



REVISIONS

No.	Date	By	Issue/Revision Details



DRAWING TITLE:
EXISTING SITE PLAN

PROJECT:
KNELLER HALL SCHOOL

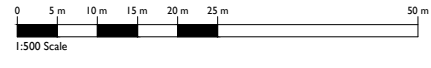
CLIENT:
Dukes Education
London SW1V 1PP

Rev No: - Date: 01/04/22

Drawn: AS Checked: AM Approved: -

Scale: as shown Drawing No: LXA-1629-002-SITE

1 Existing Site Plan
Scale 1:500@A0



APPENDIX 2: GOOGLE EARTH SATELLITE IMAGES

(source: Google Earth)

Kneller Hall – Google Earth Images

September 1999



August 2001



December 2003



September 2004



December 2006



September 2008



June 2010



July 2017



July 2014



June 2015



June 2015



April 2017



May 2018



June 2019



June 2020



March 2021



March 2022






July 2022





APPENDIX 3: EXISTING AND PROPOSED DEVELOPMENT IN THE MOL



- KEY**
-  Existing Building
 -  MOL Boundary
 -  Site Boundary

PLANNING

REVISION	DATE	DESCRIPTION	ARCHITECT	PARTNER
S2 P 1	19.10.22	PLANNING SUBMISSION	ADP	

Building in MOL	Existing Floor Area (GIA m2)	Existing Footprint (m2)	Proposed Floor Area (GIA m2)	Proposed Footprint (m2)
1 - To be demolished	281.304	312.56	(Sports Pavilion) 305.44	(Sports Pavilion) 339.38
2 - To be demolished	78.552	87.28		
3 - To be demolished	19.629	21.81		
4 - To be demolished	62.343	69.27		
5 - To be demolished	20.538	22.62		
6 - To be demolished	8.937	9.93		
7 - To be demolished	47.988	53.32		
8 - To be retained	87.165	96.85	(Building 3 / Energy Centre) 87.17	96.85
9 - To be demolished	172.2519	191.391		
10 - To be demolished	74.97	83.3		
11 - To be demolished	71.01	78.9		
12 - To be retained	39.37	97.99	(Building 2 / Energy Centre) 91.812	102.01
13 - To be demolished	67.61	71.1		
TOTAL	1031.6679	1196.521	484.422	538.24

CHECK ALL DIMENSIONS AND VERIFY ON SITE. REPORT ANY ERRORS OR OMISSIONS



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JOB TITLE:
**KNELLER HALL SCHOOL
MASTERPLAN**

DRAWING TITLE:
MOL BUILDINGS

SCALE:	DRAWING SHEET SIZE:
1 : 1000	A1
JOB CODE: 001506	DRAWING NUMBER: ADP-00-00-DR- A-1006
REVISION: S2 P 1	

17 Strategies and schedules

Area Plans/Height plan

The site plan opposite shows the number of storeys and building heights for both the proposed and retained buildings on the site.



BUILDING SCHEDULE FLOOR AREA GIA (SQM)

	Existing GIA Retained	New Build GIA	Proposed Total GIA
Kneller Hall	3928.1	221.8	4114.5
Guards House	465.5	0	465.5
Band Practice Hall	230.7	129.3	366.0
Teaching Block	0	5069.0	5069.0
Sports Centre	0	2977.2	2977.2
Sports Pavilion	0	305.4	305.4
Energy Centre	313.8	109.6	413.4
Storage Hut	45.7	0	45.7
Total		8812.4	13756.0

STOREYS & GROSS INTERNAL AREAS - SUMMARY (SQM)

	Existing Footprint	Proposed Footprint	Demolished Footprint	Existing GIA*	Proposed GIA	Demolished GIA
Whole site	4550	7194	3031	9811.2	13756	4862.8
In MOL	1196.5	538	977	1031.7	484	905.1

*GIA for existing buildings assumption calculated 90% GEA

17 Strategies and schedules

Existing and Proposed Hardstanding in MOL



EXISTING HARDSTANDING AREA

Hardstanding	Area (m ²)*
In MOL	6448



PROPOSED HARDSTANDING AREA

Hardstanding	Area (m ²)*
In MOL	5808

17 Strategies and schedules

Existing and Proposed Floorspace and volume in MOL



FLOORSPACE (EXISTING)

	GIA (m ²) *	Volume (m ³) **
In MOL	1031.7	2544



FLOORSPACE (PROPOSED)

	GIA (m ²) *	Volume (m ³) **
In MOL	484.42	1453

*GIA for existing buildings assumption calculated 90% GEA